

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AMYRIS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-11131 (TMH)

(Jointly Administered)

Re Docket No. 917

**CERTIFICATION OF COUNSEL REGARDING
DEBTORS' MOTION FOR (I) AN ORDER (A) APPROVING BID PROCEDURES FOR
THE SALE OF THE DEBTORS' LAB-TO-MARKET ASSETS; (B) SETTING
MINIMUM RESERVE PRICE; (C) SCHEDULING THE AUCTION AND SALE
HEARING; (D) APPROVING THE FORM AND MANNER OF NOTICE THEREOF;
AND (E) GRANTING RELATED RELIEF; AND (II) AN ORDER OR ORDERS (A)
APPROVING THE SALE OF THE DEBTORS' LAB-TO-MARKET ASSETS FREE AND
CLEAR OF ALL ENCUMBRANCES; AND (B) APPROVING THE ASSUMPTION AND
ASSIGNMENT OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

The undersigned hereby certifies that:

1. On December 14, 2023, the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") filed the *Motion for (I) an Order (A) Approving Bid Procedures for the Sale of the Debtors' Lab-to-Market Assets; (B) Setting Minimum Reserve Price; (C) Scheduling the Auction and Sale Hearing; (D) Approving the Form and Manner of Notice Thereof; and (E) Granting Related Relief; and (II) an Order or Orders (A) Approving the Sale of the Debtors' Lab-to-Market Assets Free and Clear of All Encumbrances; and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases* [Docket No. 917] (the "Motion").²

¹ A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.stretto.com/Amyris>. The location of Debtor Amyris Inc. principal place of business and the Debtors' service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Pursuant to the *Notice of Hearing re Debtors' Motion for (I) an Order (A) Approving Bid Procedures for the Sale of the Debtors' Lab-to-Market Assets; (B) Setting Minimum Reserve Price; (C) Scheduling the Auction and Sale Hearing; (D) Approving the Form and Manner of Notice Thereof; and (E) Granting Related Relief; and (II) an Order or Orders (A) Approving the Sale of the Debtors' Lab-to-Market Assets Free and Clear of All Encumbrances; and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases* [Docket No. 925], objections to the Motion were due on December 19, 2023 at 5:00 p.m. [ET].

3. On December 18 2023, the Ad Hoc Cross-Holder Group (the "Cross-Holder Group") filed the *Limited Objection of Ad Hoc Cross-Holder Group to Debtors' Motion for an Order (I) Approving the Bid Procedures for the Sale of the Debtors' Lab-to-Market Assets; (B) Setting Minimum Reserve Price; (C) Scheduling the Auction and Sale Hearing; (D) Approving the Form and Manner of Notice Thereof; and (E) Granting Related Relief; and (II) an Order or Orders (A) Approving the Sale of the Debtors' Lab-to-Market Assets Free and Clear of All Encumbrances; and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases* [Docket No. 945].

4. The Debtors and the Cross-Holder Group have conferred and agreed on the revised form of Proposed Order attached hereto as **Exhibit A**.

5. A blacklined copy of the Proposed Order is attached hereto as **Exhibit B** showing changes from the proposed order filed with the Motion.

6. Accordingly, the Debtors request that the Proposed Order attached hereto as **Exhibit A** be entered at the Court's earliest convenience.

7. The Debtors are available should the Court have any questions regarding the Proposed Order.

Dated: December 20, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

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